#### **GREENSPOON MARDER LLP**

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Attorneys for Defendant Joy Rockwell Enterprises, Inc. d/b/a PostcardMania PCM LLC

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

ATLAS DATA PRIVACY CORPORATION, as assignee of individuals who are Covered Persons, JANE DOE-1, a law enforcement officer, JANE DOE-2, a law enforcement officer, EDWIN MALDONADO, SCOTT MALONEY, JUSTYNA MALONEY, PATRICK COLLIGAN, PETER ANDREYEV, and WILLIAM SULLIVAN,

Plaintiff,

v.

JOY ROCKWELL ENTERPRISES, INC. d/b/a POSTCARDMANIA PCM LLC, RICHARD ROES 1-10, fictitious names of unknown individuals, and ABC COMPANIES 1-10, fictitious names of unknown entities,

Defendants.

Case No.: 3:24-cv-04389

Civil Action

CLERK'S EXTENTION OF TIME TO ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT PURSUANT TO L. CIV. R. 6.1(b)

Pursuant to Local Civil Rule 6.1(b), Defendant Joy Rockwell Enterprises, Inc.

d/b/a PostcardMania PCM LLC ("PostcardMania"), by and through its undersigned

counsel, hereby applies for a Clerk's Order extending the time by which PostcardMania my answer, move, or otherwise respond to Plaintiffs' Complaint by fourteen (14) days and represent as follows:

- 1. No previous extensions have been obtained.
- 2. This case was timely removed from the Superior Court of New Jersey, Monmouth County on March 29, 2024 (Doc. No. 01).
- 3. Pursuant to *Fed. R. Civ. P.* 81(c)(2)(C), PostcardMania's time to answer, move, or otherwise respond to Plaintiffs' Complaint expires on April 5, 2024.

DATED: April 4, 2024 Respectfully submitted,

### /s/ Kory Ann Ferro

### **GREENSPOON MARDER LLP**

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**ORDER** 

The above application is hereby **GRANTED**. Defendant Joy Rockwell Enterprises, Inc. d/b/a PostcardMania PCM LLC's time to answer, move, or otherwise respond to Plaintiffs' Complaint is extended by fourteen (14) days until April 19, 2024.

Clerk of the United States District Court District of New Jersey

# **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 4th day of April, 2024, a copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

<u>/s/ Kory Ann Ferro</u>

Kory Ann Ferro, Esq.